Attorney's Docket No.: 10559-408001

## Remarks

Reconsideration and allowance of the above referenced application are respectfully requested.

Claims 1-30 stand rejected under 35 USC 103(a) as allegedly being unpatentable over Balakrishnan in view of Scott, et al.. This contention, however, is respectfully traversed. Claim 1 requires that information about a recognized phrase is received from a speech engine, and claim 1 also requires automatically selecting, based on the recognized phrase, a handler function from among the multiple sets of handling information. Claim 1 requires that each set of handling information is associated with a different application and also requires "loading a first grammar for a first application that is automatically selected on the speech engine separate from the first application and loading a second, different grammar for a second automatically recognized application on the speech engine". The rejection alleges that this is shown by Balakrishnan and specifically by column 4 lines 40-66. However, with all due respect, this cited section, and the Balakrishnan patent itself, teaches very different subject matter.

Balakrishnan teaches an arbitrator which determines which application receives the input speech. Lines 38-40 explain that the arbitrator may simply determine this from the highest score. A more advanced form uses the arbitrator as being context

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dependent, see column 4 lines 53-55. This causes the arbitrator to arbitrate between the in focus application and the out of focus application. While column 4 lines 66-67 explains that a key set of commands is stored in the arbitrator, in all cases of the arbitrator, it provides the commands to all different engines, and decides which one will handle those commands. Balakrishnan does not load a first grammar for a first application and a second grammar for a second application as claimed. Rather, Balakrishnan teaches quite the opposite: that all commands are directed to all grammars, that the grammar that is in focus may receive a higher threshold of confidence than the out of focus grammar, but that all grammars are accessed at all times.

The rejection admits that Balakrishnan does not teach the speech engine being separate from the applications themselves, and alleges that this is shown in Scott, et al. While Scott, et al. does teach a speech recognition system separate from an application, it does not teach or suggest this in the context of multiple applications.

Claim 1 should therefore be allowable along with the claims that depend therefrom. To summarize the above, the hypothetical combination of Balakrishnan in view of Scott, et al. does not teach or suggest selecting a handler function from multiple sets of handling information and loading the grammar based on the

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application. Rather, Balakrishnan in view of Scott, et al. would use Balakrishnan's teaching of directing the information to all grammars at the same time.

Claim 12 includes analogous limitations and should be allowable, therefore, for analogous reasons.

Claim 22 defines analogous limitations, including "loading the first grammar for a first application...", and should be allowable for similar reasons to those discussed above.

Each of the dependent claims should be analogously allowable for similar reasons as well as on their own merits. For example, claim 34 should be allowable for similar reasons to those discussed on pages 17-19 of the previous response.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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Applicant asks that all claims be allowed. Please apply.... the Petition for Extension of Time fee and any other charges or credits to Deposit Account No. 06-1050.

tfully submitted,

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